

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF  
PLAINTIFFS' BRIEF IN SUPPORT OF DAUBERT MOTION TO PRECLUDE  
OPINIONS OF DEFENSE JOHN FLACK, M.D., M.P.H.**

**DANIEL A. NIGH**, hereby certifies as follows:

1. I am an attorney at law within the State of Florida with Nigh Goldenberg Raso & Vaughn and serve as Court-appointed Plaintiffs' co-lead counsel to the Plaintiff's side. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' brief in support of Daubert motion to preclude opinions of defense expert John Flack, M.D., M.P.H.
2. Attached hereto as **Exhibit 1** to the Motion is a true and accurate copy of the Expert Report of John Flack, M.D., M.P.H.
3. Attached hereto as **Exhibit 2** to the Motion is a true and accurate copy of the February 1, 2023 Transcript of the videotaped deposition of John Flack, M.D., M.P.H.

**NIGH GOLDBERG RASO  
& VAUGHN, PLLC**  
*Attorneys for Plaintiffs*

Dated: March 13, 2023

By: /s/ Daniel A. Nigh  
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